

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
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Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICES DATED APRIL 22, 2011**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: JUNE 6, 2011**

Date: May 20, 2011

From: Jesse Jantzen

\_\_\_\_\_  
Name (Print or type)

\_\_\_\_\_  
(Signature)

\_\_\_\_ Operator / Owner – Elder Care Alliance

\_\_\_\_\_  
Agency, jurisdiction, chapter, company, association, individual, etc.

1301 Marina Village Pkwy, Ste. 210 Alameda CA 94501

\_\_\_\_\_  
Street

\_\_\_\_\_  
City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip

I/We (do)(do not) agree with:

☐ The Agency proposed modifications As Submitted on Section No. OSHPD 03/10 - 2010

and request that this section or reference provision be recommended:

☒ Approved ☐ Disapproved ☐ Held for Further Study ☐ Approved as Amended

*note general comment below.*

**Suggested Revisions to the Text of the Regulations:**

I have previously sent a comment supporting the proposed "household" amendments to the SNF construction regulations. In reviewing the proposals again I was struck by an internal inconsistency which I had not noticed. Most of the references are to the "residents" which is correct. But there are many references to "patients" which is incorrect.

**Reason:** [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

A SNF no matter what style has residents. An acute hospital has patients. The difference in relations with the staff is symbolized by the two words. The household model emphasizes the resident character of the facility - it is there to serve the resident, to assist to encourage the resident in all daily activities. The character of a "household" de-emphasizes the institutional character of the facility. Whereas an

acute hospital exists to treat the patient to cure them as far as possible and discharge them. The interplay is totally different and the patient has much less control than the resident. The difference is not just semantic. It sets the tone for everything.

I hope you will discard the term patient and use only resident in the regulations.